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17 **Attorneys for Plaintiffs**

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19 **UNITED STATES DISTRICT COURT**
20 **FOR THE DISTRICT OF NEVADA**

21
22 PETER DELVECCHIA, *et al.*,) Case No: 2:19-CV-01322-KJD-DJA
23 Plaintiffs,)
24 vs.) PLAINTIFFS' THIRD MOTION
25) FOR LEAVE TO FILE EXHIBIT
26) UNDER SEAL
27 FRONTIER AIRLINES, INC., *et al.*,) LR IA 10-5
28 Defendants.)
29 _____)

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31 Plaintiffs, Peter DelVecchia individually and as next friend of A. D., a minor, by counsel,
32 hereby move pursuant to Local Rule IA 10-5(a) for leave to file Exhibit A to their Supplemental
33 Motion for Sanctions (ECF No. 141), consisting of certain redacted Frontier incident reports of
34 suspected human trafficking and/or sex trafficking, and complaints by other Frontier passengers of
35 racial discrimination, and some additional records, under seal. The sole reason for Plaintiffs seeking
36 leave to file the documents under seal is that Frontier produced them stamped “**CONFIDENTIAL**
37

38 PLAINTIFFS' THIRD MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL

SUBJECT TO PROTECTIVE ORDER" indicating designation under the Protective Order entered in this action on October 10, 2019 (ECF No. 37). That Order does not specifically authorize the filing of any document under seal. Plaintiffs do not believe that the documents contain "confidential information" worthy of protection under that Order, and hereby give notice of their position to Defendants pursuant to Paragraph 3 of that Order. For the present time, however, this Motion is filed pursuant to LR IA 10-5.

DATED this 2nd day of November, 2021.

/s/ John D. McKay
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